

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
ARMSTRONG FLOORING, INC., <i>et al.</i> ,	Case No. 22-10426 (MFW)
Debtors. ¹	(Jointly Administered)
Armstrong Flooring, Inc.	
Plaintiff,	
vs.	Adv. Proc. No. 23-50068 (MFW)
TBL Services, Inc., and Total Transportation of Mississippi LLC,	
Defendants.	

**CERTIFICATION OF COUNSEL REQUESTING EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO THE COMPLAINT**

I, Peter J. Keane, of Pachulski Stang Ziehl & Jones LLP, counsel for counsel for Alfred T. Giuliano, chapter 7 trustee (the “Plaintiff” or “Trustee”) to the estate in the above-captioned adversary proceeding (the “Adversary Proceeding”), hereby certify as follows:

1. On or about January 30, 2023, Armstrong Flooring, Inc.² initiated the Adversary Proceeding by the filing of an adversary *Complaint to Avoid Transfers Pursuant to 11 U.S.C. §§ 547, 548 and 502 and to Recover Property Transferred Pursuant to 11 U.S.C. § 550* (the “Complaint”) [Docket No. 1] against, among others, TBL Services, Inc. (the “Defendant” together with Plaintiff the “Parties”).

¹ The Debtors in these chapter 7 cases, along with the last four digits of their respective tax identification numbers, are as follows: Armstrong Flooring, Inc. (3305); AFI Licensing LLC (3265); Armstrong Flooring Latin America, Inc. (2943); and Armstrong Flooring Canada Ltd. (N/A).

² The Adversary Proceeding was originally filed by the Debtors. On April 17, 2023, their chapter 11 cases were converted to ones under chapter 7 of the Bankruptcy Code, and the Trustee is now the Plaintiff as the successor in interest.

2. On or about February 2, 2023, a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* (the “Summons”) [Docket No. 3] was filed.

3. The Parties have engaged in discussions concerning a potential resolution of the Adversary Proceeding and have agreed to continue these discussions prior to requiring Defendant to file its answer or other response to the Complaint. Accordingly, the Parties have agreed that the time within which Defendant may answer, move or otherwise plead to the Complaint should be extended to and including August 5, 2023. The Parties have memorialized their agreement in the *Stipulation Extending Time for Defendant to Respond to the Complaint* (the “Stipulation”).

4. Attached hereto as **Exhibit A** is a proposed order (the “Order”) approving the Stipulation. A copy of the Stipulation is attached to the Order as **Exhibit 1**.

WHEREFORE, the Parties respectfully request entry of the Order.

Dated: July 12, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292
Kara E. Casteel, Esq., MN SBN 0389115
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3846
Email: kcasteel@askllp.com

*Counsel for Alfred T. Giuliano,
Chapter 7 Trustee of Armstrong Flooring,
Inc., et al.*

EXHIBIT “A”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
ARMSTRONG FLOORING, INC., <i>et al.</i> ,	Case No. 22-10426 (MFW)
Debtors.	(Jointly Administered)
Armstrong Flooring, Inc.	
Plaintiff,	
vs.	Adv. Proc. No. 23-50068 (MFW)
TBL Services, Inc., and Total Transportation of Mississippi LLC,	
Defendants.	

**ORDER APPROVING STIPULATION FOR EXTENSION OF TIME
FOR DEFENDANT TO RESPOND TO THE COMPLAINT**

AND NOW upon consideration of the *Stipulation for Extension of Time for Defendant to Respond to the Complaint* (the “Stipulation”) between Alfred T. Giuliano, chapter 7 trustee (the “Plaintiff” or “Trustee”) to the estate in the above-captioned adversary proceeding and TBL Services, Inc. (the “Defendant”) attached hereto as **Exhibit “1”**; the Court having determined that no further notice of the Stipulation must be given; it is hereby

ORDERED that the Stipulation is hereby **APPROVED**, and it is

FURTHER ORDERED that the time within which Defendant may answer, move or otherwise plead to the Complaint is hereby further extended to and including August 5, 2023.

EXHIBIT “1”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: ARMSTRONG FLOORING, INC., <i>et al.</i> , Debtors. ¹	Chapter 7 Case No. 22-10426 (MFW) (Jointly Administered)
Armstrong Flooring, Inc. Plaintiff, vs. TBL Services, Inc., and Total Transportation of Mississippi LLC, Defendants.	 Adv. Proc. No. 23-50068 (MFW)

**STIPULATION FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO THE COMPLAINT**

Alfred T. Giuliano, chapter 7 trustee (the “Plaintiff” or “Trustee”) to the estate in the above-captioned adversary proceeding, and TBL Services, Inc. (the “Defendant” and, together with Plaintiff, the “Parties”), through their respective counsel, enter into this *Stipulation for Extension of Time for Defendant to Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead to the Complaint [D.I. 1] is hereby further extended to and including August 5, 2023.

¹ The Debtors in these chapter 7 cases, along with the last four digits of their respective tax identification numbers, are as follows: Armstrong Flooring, Inc. (3305); AFI Licensing LLC (3265); Armstrong Flooring Latin America, Inc. (2943); and Armstrong Flooring Canada Ltd. (N/A).

Dated: July 7, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)
Peter J. Keane (DE Bar No. 5503)
Edward A. Corma (DE Bar No. 6718)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: bsandler@pszjlaw.com
pkeane@pszjlaw.com
ecorma@pszjlaw.com

-and-

ASK LLP

Joseph L. Steinfeld, Jr., Esq., MN SBN 0266292
Kara E. Casteel, Esq., MN SBN 0389115
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3846
Email: kcasteel@askllp.com

*Counsel for Alfred T. Giuliano,
Chapter 7 Trustee of Armstrong Flooring,
Inc., et al.*

Dated: July 7, 2023

WHITEFORD TAYLOR & PRESTON LLP

/s/ Richard W. Riley

Richard W. Riley (No. 4052)
600 North King Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 353-4144
Email: rriley@whitefordlaw.com

-and-

David W. Gaffey, Esq.
3190 Fairview Park Drive, Suite 800
Falls Church, Virginia 22042-4510
Telephone: (703) 280-9260
Email: dgaffey@whitefordlaw.com

Counsel for TBL Services, Inc.